

### **REMARKS/ARGUMENTS**

Claims 21-44 are pending.

Claims 21, 23-29, 31-37, and 39-44 are rejected under 35 USC 102(b) as being anticipated by Vora et al. (US Patent No. 6,385,563). Claims 22, 30, and 38 are rejected under 35 USC 103(a) as being unpatentable over Silva et al. (US Patent No. 6,184,901) further in view of Falacara et al. (US Patent No. 6,377,263). In response, for the reasons discussed below, the rejections are asserted to now be moot.

The specification was objected-to as failing to describe a “machine-readable medium.” In response, for the reasons discussed below, the rejections are asserted to now be moot.

### **DISCUSSION**

#### **I. NON-ART OBJECTION**

The specification was objected-to as failing to describe a “machine-readable medium.” In response, the undersigned respectfully traverses the objection. Initially, it is noted that the specification describes a computer system 100 including a computer 120 (a machine) including computer components such as a random access memory (RAM) 170 and disk drives 180 interconnected via system bus 190. [0035] Further, the specification describes RAM 170 and disk drive 180 as being, “examples of tangible media.” [0037] Accordingly, because RAM 170 and disk drive 180 can be read by computer 120, the disclosure of RAM 170 and disk drive 180 provide support for the term “machine-readable medium.” The objection is thus traversed.

#### **II. PRIOR-ART REJECTIONS**

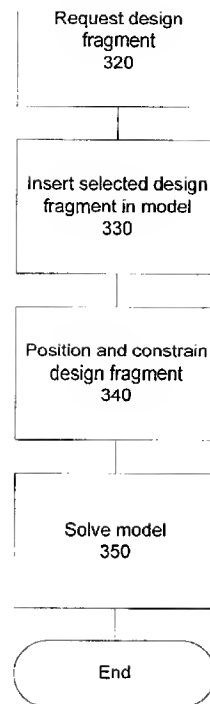
In light of the amendments to the claims, the undersigned respectfully traverses the rejections of claims 21-44 under 35 USC 102(b) or 35 USC 103(a).

A. Claim 21

In light of the current amendments, the undersigned respectfully traverses the rejection of claim 21 as being anticipated by Vora. More specifically, Vora fails to disclose the limitation of:

*storing a reference to the second computer graphics model in the first computer graphics, wherein the second computer graphics model is not stored in the first computer graphics model.*

In contrast to the above claim limitation, Vora merely discloses retrieving a design fragment, not merely referencing the design fragment. These are two very different concepts. As stated in Vora, a design fragment is retrieved and stored as part of a model. Specifically, Vora illustrates in Fig. 3, that a model is built in step 310, a design fragment is requested in step 320, and the design fragment is inserted into the model in step 330.



**Figure 3**

Additionally, Vora describes step 330 as an insertion step. More specifically Vora states:

*Next at step 330, the selected reusable design component is inserted into the user's model. A single new model object is added to the model data. The new model object is a design fragment created from the design fragment data. Col. 9, 1.18-20, emphasis added.*

To reinforce the point that Vora describes inserting reusable design components into a user's model, Vora describes that each time a design component is used an additional copy of the reusable design component is added to the user's model. Specifically, Vora describes:

*Each use of the reusable design component in the model 175 only adds a single additional model object to the model data 170. Col. 7, l.31-32, emphasis added.*

In light of the above, it can be seen that Vora contemplates retrieving one or more copies of a design fragment (e.g. a template) into the model.

A problem with inserting copies of design fragments into a model was expressly described in the background of the present specification. More specifically, the inventor disclosed that by adding copies or templates of an object to a larger model, subsequent changes to the object are not automatically propagated. For example, the specification noted:

*[0009] One method for creating an object, not necessarily in the prior art, is with the use of templates as starting points for customization. For example, to create an object, a user may retrieve a template for the object, customize it, and then save the customized object. As another example, a user may use templates of more than one object as a starting point to create a larger object, and then customize the objects. In such cases, after customization, the objects that are specified by the templates are stored as part of the created object.*

*[0010] Disadvantages to these approaches include that subsequent changes to the original model template, after the object template was used, are not propagated to the created object. Instead, any changes to the object template would have to be manually propagated to the objects that used the template.*

One of the solutions described by the present patent application was the concept of object referencing. In various embodiments, embodiments of the present invention disclose storing a reference to a model in a larger model, but not the model itself into a larger model (see support underlined below [0067]). As described in embodiments of the present invention, by referencing a model, any subsequent changes to the model may be automatically used when the larger model is next opened. As can be seen in the example below, if a hand model that is referenced by a larger model has only four fingers, when the hand model is subsequently

modified to include five fingers, the larger model will automatically use the five-fingered hand. For example, the present specification states:

*[0067] In the present embodiment, each time a model is referenced, the object creation environment retrieves the latest copy of the referenced model stored in the storage system. Thus, for example, in the situation above, when the user initially defines a lower arm model, a hand model specifies four fingers. Later, the hand model is updated to include five fingers. Subsequently, when the user re-opens the lower arm model, the object creation environment references the latest hand model that specifies five fingers. Because a copy of the referenced object is not stored in the new object model, in embodiments, the environment requests the latest "released" or "checked-in" object models. In this embodiment, the referencing functionality is provided to the object creation environment so that it opens the correct reference model, and applies the appropriate set attributes. Emphasis added.*

The Examiner's assertion as to the teaching of a "reference" in claim 23 is traversed. With respect to claim 23, for example, the Examiner asserted that Vora col. 6, l.41-45 taught including "a reference." As discussed in the present patent application, object referencing is very different from pulling-in an object, as was disclosed in Vora. In fact, the passage cited by the Examiner merely discloses pulling-in an object in Vora:

*Once selected, a single model object for the selected design fragment is added to the model data 170. Col. 6, l.41-45, emphasis added.*

In light of the above, claim 21, as amended, is not anticipated by Vora.

B. Remaining claims

Claims 21-28, dependent upon claim 21 are also asserted to be allowable for substantially the same reasons as claim 21, and more specifically for the specific limitations they recite.

Independent claims 29 and 37 are also asserted to be allowable for substantially the same reasons as claim 1, and more specifically for the specific limitations they recite.

Claims 30-26, dependent upon claim 29 are also asserted to be allowable for substantially the same reasons as claim 29, and more specifically for the specific limitations they recite.

Claims 38-44, dependent upon claim 37 are also asserted to be allowable for substantially the same reasons as claim 37, and more specifically for the specific limitations they recite.

### **CONCLUSION**

In view of the foregoing, Applicants believe all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 650-326-2400.

Respectfully submitted,

**/Stephen Y. Pang/**

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